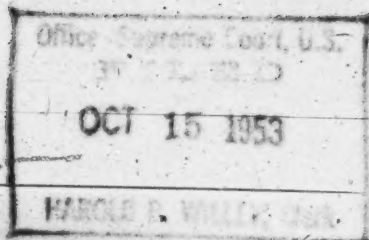


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IN THE
Supreme Court of the United States

October Term, 1953

No. Original.

STATE OF ALABAMA,

Complainant,

vs.

**STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA;
STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS
McKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST,
Defendants.**

**Motion for Leave to File Objections and Brief in
Opposition to Motion for Leave to File Complaint
and for Oral Hearing.**

**RICHARD W. ERVIN
Attorney General of Florida**

**HOWARD S. BAILEY
Assistant Attorney General**

**FRED M. BURNS
Assistant Attorney General**

**JOHN D. MORIARTY
Special Assistant Attorney General
Attorneys for Mopant.**

**IN THE
Supreme Court of the United States**

October Term, 1953

No. Original.

STATE OF ALABAMA,

Complainant,

vs.

**STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA;
STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS
McKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST,**

Defendants.

**Motion for Leave to File Objections and Brief in
Opposition to Motion for Leave to File Complaint
and for Oral Hearing.**

**The People of the State of Florida move for leave to
file objections and a brief in opposition to the motion
of the State of Alabama for leave to file a complaint,
and, because of the length and complexity of the com-
plaint and supporting brief, request that not less than
thirty (30) days be allowed for such purpose.**

The People of the State of Florida further move the Court to set said motion of the State of Alabama for an oral hearing after the filing of briefs.

RICHARD W. ERVIN
Attorney General of Florida

HOWARD S. BAILEY
Assistant Attorney General

FRED M. BURNS
Assistant Attorney General

JOHN D. MORIARTY
Special Assistant Attorney General
Attorneys for Movant.

October 14, 1953

I, Pauline H. Evans, being first duly sworn, certify that I am over the age of 18 years and not a party to the within action; that on October 14, 1953, I served a copy of the foregoing Motion upon each of the following named individuals by mailing a copy of the Motion to them, postage prepaid, at the following addresses:

Hon. Si Garrett
Attorney General of Alabama
State Capitol
Montgomery, Alabama

Hon. John Ben Sheppard
Attorney General of Texas
State Capitol
Austin, Texas

Hon. Fred E. Loblans
Attorney General of Louisiana
State Capitol
Baton Rouge, Louisiana

Hon. George M. Humphrey
Secretary of the Treasury
Department of the Treasury
Washington, D. C.

Hon. Edmund G. Brown
Attorney General
State Capitol
Sacramento, California

Hon. Douglas McKay
Secretary of the Interior
Department of the Interior
Washington, D. C.

Hon. Robert B. Anderson
Secretary of the Navy
Department of the Navy
Washington, D. C.

Hon. Ivy Baker Priest
Treasurer of the United States
Department of the Treasury
Washington, D. C.

Hon. Herbert Brownell, Jr.
Attorney General of the United States
Department of Justice
Washington, D. C.

PAULINE H. EVANS

State of Florida, County of Leon—ss.

Subscribed and sworn to before me this 14 day of October, 1953.

M. D. PHILLIPS
Notary Public, State of Florida at Large
My commission expires July 15, 1956.
Bonded by American Surety Co. of N. Y.

(Seal)

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OCT 5 1953

HAROLD B. WILLEY, Clerk

IN THE

Supreme Court of the United States

October Term, 1953.

No. _____, Original.

STATE OF ALABAMA,

Complainant,

vs.

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA;
STATE OF CALIFORNIA; GEORGE M. HUMPHREY;
DOUGLAS MCKAY; ROBERT B. ANDERSON; IVY BAKER
PRIEST,

Defendants.

**Motion for Leave to File Objections and Brief in
Opposition to Motion for Leave to File Complaint
and for Oral Hearing.**

EDMUND G. BROWN,
Attorney General of California;

WILLIAM V. O'CONNOR,
Chief Deputy Attorney General;

EVERETT W. MATTOON,
Assistant Attorney General;

GEORGE G. GROVER,
Deputy Attorney General,
600 State Building,
Los Angeles 12, California,
Attorneys for Movant.

IN THE
Supreme Court of the United States

October Term, 1953.
No., Original.

STATE OF ALABAMA,

Complainant,

vs.

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLOR-
IDA; STATE OF CALIFORNIA; GEORGE M. HUMPHREY;
DOUGLAS MCKAY; ROBERT B. ANDERSON; IVY BAKER
PRIEST,

Defendants.

**Motion for Leave to File Objections and Brief in
Opposition to Motion for Leave to File Complaint
and for Oral Hearing.**

The People of the State of California move for leave to file objections and a brief in opposition to the motion of the State of Alabama for leave to file a complaint, and, because of the length and complexity of the complaint and supporting brief, request that not less than thirty (30) days be allowed for such purpose.

IN THE
Supreme Court of the United States

October Term, 1953.
No., Original.

STATE OF ALABAMA,

Complainant,

vs.

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLOR-
IDA; STATE OF CALIFORNIA; GEORGE M. HUMPHREY;
DOUGLAS MCKAY; ROBERT B. ANDERSON; IVY BAKER
PRIEST,

Defendants.

**Motion for Leave to File Objections and Brief in
Opposition to Motion for Leave to File Complaint
and for Oral Hearing.**

The People of the State of California move for leave
to file objections and a brief in opposition to the motion
of the State of Alabama for leave to file a complaint,
and, because of the length and complexity of the complaint
and supporting brief, request that not less than thirty
(30) days be allowed for such purpose.

The People of the State of California further move the Court to set said motion of the State of Alabama for an oral hearing after the filing of briefs.

EDMUND G. BROWN,
Attorney General of California;

WILLIAM V. O'CONNOR,
Chief Deputy Attorney General;

EVERETT W. MATTOON,
Assistant Attorney General;

GEORGE G. GROVER,
Deputy Attorney General,
Attorneys for Movant.

By WILLIAM V. O'CONNOR,

October 2, 1953.

Affidavit of Service.

I, Leilani Kroll, being first duly sworn, certify that I am over the age of 18 years and not a party to the within action; that on October 2, 1953, I served a copy of the foregoing Motion upon each of the following named individuals by mailing a copy of the Motion to them, postage prepaid, at the following addresses:

Hon. Si Garrett
Attorney General of Alabama
State Capitol
Montgomery, Alabama

Hon. Douglas McKay
Secretary of the Interior
Department of the Interior
Washington, D. C.

Hon. John Ben Shepperd
Attorney General of Texas
State Capitol
Austin, Texas

Hon. Robert B. Anderson
Secretary of the Navy
Department of the Navy
Washington, D. C.

Hon. Fred S. Leblanc
Attorney General of Louisiana
State Capitol
Baton Rouge, Louisiana

Hon. Ivy Baker Priest
Treasurer of the United States
Department of the Treasury
Washington, D. C.

Hon. Richard W. Ervin
Attorney General of Florida
State Capitol
Tallahassee, Florida

Hon. Herbert Brownell, Jr.
Attorney General of the United States
Department of Justice
Washington, D. C.

Hon. George M. Humphrey
Secretary of the Treasury
Department of the Treasury
Washington, D. C.

LEILANI KROLL.

State of California, County of Los Angeles—ss.

Subscribed and sworn to before me this 2nd day of
October, 1953.

KATHRYN BUCKMAN,
Notary Public in and for Said County and State.

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IN THE
Supreme Court of the United States

OCTOBER TERM, 1963

No. _____, Original

STATE OF ALABAMA

Complainant,

v.

**STATE OF TEXAS; STATE OF LOUISIANA; STATE OF
FLORIDA; STATE OF CALIFORNIA; GEORGE M. HUM-
PHREY; DOUGLAS MCKAY; ROBERT B. ANDERSON;
IVY BAKER PRIEST,**

Defendants.

**Motion for Leave To File Objections and Brief
in Opposition to Motion for Leave To File
Complaint and for Oral Hearing**

JOHN BEN SHEPPERD
Attorney General of Texas

WILLIAM H. HOLLOWAY
Assistant Attorney General

IN THE
Supreme Court of the United States

OCTOBER TERM, 1953

No. _____, Original

STATE OF ALABAMA

Complainant,

v.

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF
FLORIDA; STATE OF CALIFORNIA; GEORGE M. HUM-
PHREY; DOUGLAS MCKAY; ROBERT B. ANDERSON;
IVY BAKER PRIEST,

Defendants.

**Motion for Leave To File Objections and Brief
in Opposition to Motion for Leave To File
Complaint and for Oral Hearing**

The State of Texas, by its Attorney General, asks leave of the Court to file objections and a brief in opposition to the motion of the State of Alabama for leave to file a complaint, and, because of the complexity and length of the complaint and brief submitted therewith, it is requested that not less than thirty (30) days be allowed the State of Texas for such purpose.

The State of Texas further moves the Court to set Alabama's motion for leave to file a complaint for an oral hearing after the filing of briefs.

JOHN BEN SHEPPERD
Attorney General of Texas

WILLIAM H. HOLLOWAY
Assistant Attorney General

October 12, 1953

Certificate of Service

I, William H. Holloway, certify that I have served a copy of the foregoing Motion upon each of the following named individuals by mailing a copy of same to them, postage prepaid, to the following addresses:

Hon. St Garrett
Attorney General of Alabama
State Capitol
Montgomery, Alabama

Hon. Douglas McKay
Secretary of the Interior
Department of the Interior
Washington, D. C.

Hon. Edmund G. Brown
Attorney General of California
State Capitol
Sacramento, California

Hon. Robert B. Anderson
Secretary of the Navy
Department of the Navy
Washington, D. C.

Hon. Fred S. Leblanc
Attorney General of Louisiana
State Capitol
Baton Rouge, Louisiana

Hon. Ivy Baker Priest
Treasurer of the United States
Department of the Treasury
Washington, D. C.

Hon. Richard W. Ervin
Attorney General of Florida
State Capitol
Tallahassee, Florida

Hon. Herbert Brownell, Jr.
Attorney General of the
United States
Department of Justice
Washington, D. C.

Hon. George M. Humphrey
Secretary of the Treasury
Department of the Treasury
Washington, D. C.

WILLIAM H. HOLLOWAY

State of Texas, County of Travis

Subscribed and sworn to before me this..... day
of October, 1953.

Notary Public in and for
Said County and State.

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OCT 14 1953

HAROLD B. WILLEY, Clerk

IN THE
Supreme Court of the United States
OCTOBER TERM, 1953

No., Original

STATE OF ALABAMA, *Complainant*,

v.

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA;
STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS
MCKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST,
Defendants.

**MOTION FOR LEAVE TO FILE OBJECTIONS AND BRIEF
IN OPPOSITION TO MOTION FOR LEAVE TO FILE
COMPLAINT AND FOR ORAL HEARING.**

FRED S. LEBLANC,
*Attorney General,
State of Louisiana;*

JOHN L. MADDEN,
*Assistant Attorney General,
State of Louisiana;*

BAILEY WALSH,
*Special Assistant Attorney
General,
State of Louisiana.*

IN THE
Supreme Court of the United States

OCTOBER TERM, 1953

No., Original

STATE OF ALABAMA, *Complainant,*

v.

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA;
STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS
McKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST,
Defendants.

**MOTION FOR LEAVE TO FILE OBJECTIONS AND BRIEF
IN OPPOSITION TO MOTION FOR LEAVE TO FILE
COMPLAINT AND FOR ORAL HEARING.**

The State of Louisiana, appearing herein through its Attorney General and acting pursuant to the authority vested in him by the constitution of said State, moves this Honorable Court for leave to file objections and a brief in opposition to the motion of the State of Alabama for leave to file a complaint in the above entitled matter.

The State of Louisiana represented as aforesaid suggests to the Court that the complaint above mentioned is highly complex and complicated and for such reason requests that it be allowed a period of not less than forty (40)

days for the purpose of preparing and filing such objections.

The State of Louisiana further moves the Court to set the motion of the State of Alabama for oral hearing after the filing of briefs.

FRED S. LEBLANC,
Attorney General,
State of Louisiana;

JOHN L. MADDEN,
Assistant Attorney General,
State of Louisiana;

BAILEY WALSH,
Special Assistant Attorney
General,
State of Louisiana.

By John L. Madden

October 13, 1953.

Affidavit of Service

I, John L. Madden, Assistant Attorney General of the State of Louisiana and of counsel for said State in the above and foregoing motion, being first duly sworn, certify that I have served a copy of said motion upon each of the following named persons by mailing a copy of the motion to them, postage prepaid, prior to the filing of said motion, and at the following addresses:

Hon. Si Garrett
Attorney General of
Alabama
State Capitol
Montgomery, Alabama

Hon. John Ben Shepperd
Attorney General of Texas
State Capitol
Austin, Texas

Hon. Edmund G. Brown
Attorney General of
California
State Building
San Francisco, California

Hon. Richard W. Ervin
Attorney General of
Florida
State Capitol
Tallahassee, Florida

Hon. George M. Humphrey
Secretary of the Treasury
Department of the
Treasury
Washington, D. C.

Hon. Douglas McKay
Secretary of the Interior
Department of the Interior
Washington, D. C.

Hon. Robert B. Anderson
Secretary of the Navy
Department of the Navy
Washington, D. C.

Hon. Ivy Baker Priest
Treasurer of the
United States
Department of the
Treasury
Washington, D. C.

Hon. Herbert Brownell, Jr.
Atty. General of the
United States
Department of Justice
Washington, D. C.

/s/ John L. Madden
JOHN L. MADDEN

City of Washington, District of Columbia—ss:

Subscribed and sworn to before me this 12th day of
October, 1953.

BYRD C. REED
Notary Public in and for
Said City and District.